

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ROUMANN CONSULTING INC. and
RONALD ROUSSE,

Plaintiffs,

Case No. 18-CV-1551

v.

SYMBIONT CONSTRUCTION, INC.,
SYMBIONT HOLDING COMPANY, INC.,
SYMBIONT SCIENCE, ENGINEERING AND CONSTRUCTION, INC.,
THOMAS C. BACHMAN,
SONYA K. SIMON, ESQ.,
EDWARD T. MANNING, JR. and
TIMOTHY P. NELSON,

Defendants.

STIPULATION FOR AMENDED SCHEDULING ORDER

In order to accommodate the scheduling needs of counsel,

IT HEREBY IS STIPULATED by and between the parties, by their undersigned counsel, that

1. the expert disclosure deadlines set by the Court's February 17, 2021 Order (DN 36) should be vacated in light of the discovery motions pending before the Court (DNs 37, 38, 42, 43). Depending on the outcome of the pending discovery motions, the parties respectfully ask for the schedule to be reset as follows:

- If Plaintiffs' motion to compel is denied in its entirety, Plaintiffs' expert disclosures shall be made 21 days after the Court's ruling.

- If Plaintiffs' motion to compel is granted or partially granted, Plaintiffs' expert disclosures shall be made 21 days after the compelled information is produced.
- Defendants' expert disclosures shall be due 60 days after Plaintiffs' expert witness disclosures are made.
- Rebuttal expert disclosures shall be due 30 days following the deadline for Defendants' expert disclosures.
- All discovery shall be completed no later than 21 days following the deadline for Defendants' rebuttal expert disclosures.
- Dispositive motions must be filed no later than 21 days following the close of discovery.

Alternatively, the Parties ask that a new schedule be set at a status shortly after the Court decides the pending discovery motions.

2. The parties have also agreed that SVA Certified Public Accountants, S.C., Charles Vogel, Esq., and Godfrey & Kahn, S.C.'s duty to comply with the subpoenas dated March 15, 2021 is stayed pending resolution of Defendants' motions to quash (DNs 37, 38).

Dated April 21, 2021.

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Attorneys for Plaintiffs Roumann Consulting Inc. and Ronald Rousse

s/ Scott R. Halloin

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Dated April 21, 2021.

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